



September 3, 2008

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

Re: **EX PARTE SUBMISSION**
WT Docket No. 03-66; Amendment of Parts 1, 21, 73, 74 and 101 of the
Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband
Access, Educational and Other Advanced Services in the 2150-2162 and 2500-
2690 MHz Bands

Dear Ms. Dortch:

As counsel for the National EBS Association ("NEBSA"), I met today with Blaise Scinto, John Schauble, Nancy Zaczek and Lynn Ratnavale of the Broadband Division, and Craig Bomberger of the Auctions and Spectrum Access Division, both of the Wireless Telecommunications Bureau, to discuss issues raised in the Second Further Notice of Proposed Rulemaking in WT Docket No. 03-66, relating to the licensing of Educational Broadband Service ("EBS") white space.

We discussed NEBSA's goals for the Commission's white space licensing rules, including avoiding application abuse, ensuring that white space licenses are for viable geographic areas, issuing white space licenses efficiently and quickly so as to facilitate deployment of wireless broadband services as soon as possible and, to the degree possible, avoiding auctions to select white space licensees, given the inability of many educators to participate in an auction process.

We also discussed a number of potential white space licensing options, including an open application process followed by auction, a restricted application process followed by auction, licensing to a single entity in each state, licensing to a single nation-wide entity, and two options for maximizing GSAs of existing licensees so as to partially absorb white space, followed by an open application process. We noted the importance in each application context of encouraging settlements among mutually exclusive applicants prior to auction.

We also discussed how an auction process might be structured in the context of mutually exclusive EBS applications.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, we are submitting this summary of the discussion in the meeting by filing an electronic copy of this letter in the public record of the proceeding.

Should any questions arise concerning this matter, kindly contact undersigned counsel for the National EBS Association.

Respectfully submitted,

/s/ Todd D. Gray

Todd D. Gray

cc by email:

Blaise Scinto
John Schauble
Nancy Zaczek
Lynn Ratnavale
Craig Bomberger